Jordan – Here are my observations related to the First Chemical Corporation (FCC) inspection:

- The most current RMP submission (9/18/2017) states that anhydrous ammonia is unloaded via pipeline and infrequently by railcar. According to Facility representatives, ammonia is currently only received by truck. Mr. Schilthuis stated that they have never received ammonia by railcar to his knowledge. Additionally, the pipeline from Mississippi Phosphates Corporation (MPC) was blanked and cleared back in 2015 when MPC stopped operations. Therefore, the RMP submission contains inaccurate information.
- The most current RMP submission identifies the quantity of ammonia stored in the ammonia covered process to be 347,000lbs. The maximum intended inventory documentation indicates that that the 347,000lbs represents the quantity of ammonia in the ammonia storage tank with administrative controls and the piping and other equipment (i.e., vaporizer in the nitric acid plant) contain an additional 34,614 lbs for a total ammonia quantity of 381,638lbs.
- When requesting process safety information such as physical and chemical data, materials of construction, and design codes and standards employed, Facility representatives provided the Ammonia Highly Toxic Material Manual and Chlorine Highly Toxic Material Manual. These manuals are dated July 2006 and March 2011, respectively, and contain many references to proprietary Dupont standards, studies, and manuals. Dupont divested Chemours, FCC's parent company, in 2015. Mr. Schilthuis stated that they are in the process of revising the documents to reflect the fact that the documents are Chemours documents and they are also revising/updating many of the underlying Dupont documents to be specific to Chemours corporate policies and technologies. These manuals may contain outdated, inaccurate information since the divestiture occurred in 2015. **[Jordan – this may be difficult to enforce because they will likely come back and say they have the underlying Dupont documents. However, when I asked Pete why they were referencing Dupont documents, he said they were in the process of reviewing and revising those documents. This is the reason I am saying the Manuals may reference inaccurate information. Your call if you want to include. We did not mention this in the closing meeting.]**
- The consequences of deviation spreadsheet for the ammonia storage tank area indicate that steps to avoid deviation for low levels in the storage tank are to contact MPC (the supplier). Since the pipeline was decommissioned in 2015, the steps to avoid deviation are outdated and inaccurate.
- Two Ammonia sensors were showing -1.5ppm and -3.0ppm in the field. This could lead to an erroneous low reading if the instrument drift is absolute (e.g., an actual ammonia concentration of 27ppm may only read 24ppm on the ammonia sensor and, therefore, not trip the 25ppm alarm threshold).
- One emergency SCBA case on 2nd floor of nitric acid ammonia superheater/vaporizer area is empty. Upon investigation, Pete stated the SCBA was removed intentionally due to staff reductions and the case was never removed.
- Annual certifications for operating procedures are missing for 2017 for both ammonia and chlorine covered processes and are missing for 2018 for the chlorine covered process.

Document Requests:

- P&IDs for the ammonia covered process
- P&IDs for the chlorine covered process
- All operating procedures for the ammonia covered process

- All operating procedures for the chlorine covered process
- Ammonia Highly Toxic Material Manual
- Chlorine Highly Toxic Material Manual
- Nitric SOC Limit Sheet.7.15.2015.c1 spreadsheet
- Maximum Intended Inventory Document for Ammonia
- V-818 2018 External Inspection Report and NDE results from inspector and Ultrapipe.
- MOC and PSSR documentation for Ammonia unload station installation.
- Photos